

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

EVANS JONES,

Plaintiff,

-vs-

CITY OF CHICAGO and
CHICAGO POLICE OFFICERS
COREY FLAGG, #9386 and
BRODERICK JONES, #17432,

Defendants.

DOCKETED

AUG 27 2002 No. 02 C

(jury demand)

MAGISTRATE JUDGE KEYS

02C 6077

JUDGE BUCKLO

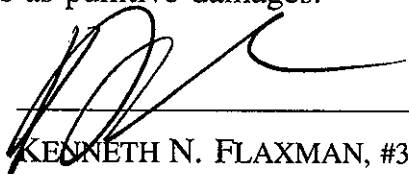
COMPLAINT

Plaintiff, by counsel, allege as follows:

1. This is a civil action arising under 42 U.S.C. §1983. The jurisdiction of this court is conferred by 28 U.S.C. §1343.
2. Plaintiff Evans Jones is a resident of the Northern District of Illinois.
3. Defendant CITY OF CHICAGO is an Illinois municipal corporation.
4. Defendants COREY FLAGG, #9386 and BRODERICK JONES, #17432 were at all times relevant acting under color their authority as Chicago police officers.
5. On September 26, 2001, defendants FLAGG and JONES arrested plaintiff and caused plaintiff to be charged with a criminal offense. Defendants FLAGG and JONES fabricated the evidence on which they made this arrest and did not have a lawful basis on which to make this arrest.

6. Thereafter, defendants FLAGG and JONES concealed defendant's innocence of any criminal wrongdoing from the prosecutors and thereby caused plaintiff to be held in custody for 8 months awaiting trial.
7. All charges against plaintiff were dismissed on August 20, 2002.
8. Defendants FLAGG and JONES committed the misconduct referred to above as the result of the deliberate indifference of defendant City of Chicago to the fabrication of evidence by its police officers.
9. As the direct and proximate result of the above described acts, plaintiff was deprived of rights secured by the Fourth and Fourteenth Amendment to the Constitution of the United States and subjected to the Illinois tort of malicious prosecution.
10. Plaintiff hereby demands trial by jury.

Wherefore plaintiff requests that judgment be entered in his favor and against defendants in an amount in excess of one hundred thousand dollars as compensatory damages and against defendants FLAGG and JONES in the amount of one hundred thousand dollars as punitive damages.



KENNETH N. FLAXMAN, #339
122 South Michigan Avenue
Suite 1850
Chicago, Illinois 60603
(312) 427-3200
attorney for plaintiff

Civil Cover Sheet

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

DOCKETED

AUG 27 2002

Civil Cover Sheet

This automated JS-44 conforms generally to the manual JS-44 approved by the Judicial Conference of the United States in September 1974. The data is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. The information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is authorized for use only in the Northern District of Illinois.

Plaintiff(s): Evans Jones

**Defendant(s): City of Chicago, Corey Flagg and
Broderick Jones**

County of Residence: Cook

County of Residence:

Plaintiff's Atty: Kenneth N. Flaxman
Kenneth N. Flaxman P.C.
122 S Michigan Ave., Ste 1850
(312) 427-3200

Defendant's Atty:

02C 6077

JUDGE BUCKLO

II. Basis of Jurisdiction:

3. Federal Question (U.S. not a party)

MAGISTRATE JUDGE KEYS

III. Citizenship of Principal
Parties (Diversity Cases Only)

Plaintiff: - N/A

Defendant: - N/A

IV. Origin :

1. Original Proceeding

V. Nature of Suit:

440 Other Civil Rights

VI. Cause of Action:

42 U.S.C. §1983: fabrication of evidence by police officers

VII. Requested in Complaint

Class Action: No

Dollar Demand: **\$100,000**

Jury Demand: Yes

VIII. This case **IS NOT** a refiling of a previously dismissed case.

Signature: _____

Date: _____

If any of this information is incorrect, please go back to the Civil Cover Sheet Input form using the *Back* button in your browser and change it. Once correct, print this form, sign and date it and submit it with your new civil action. **Note: You may need to adjust the font size in your browser display to make the form print properly.**

Revised: 06/28/00

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

Eastern Division

DOCKETED

AUG 27 2002

Case Number:

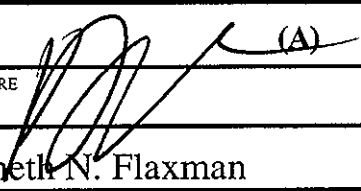
In the Matter of

Evans Jones -vs- City of Chicago, et a.,

APPEARANCES ARE HEREBY FILED BY THE UNDERSIGNED AS ATTORNEY(S) FOR

Evans Jones

MAGISTRATE JUDGE KEYS

(A)		(B)	
SIGNATURE 		SIGNATURE	
NAME Kenneth N. Flaxman		NAME	
FIRM Kenneth N. Flaxman P.C.		FIRM	
STREET ADDRESS 122 S Michigan Ave, Ste 1850		STREET ADDRESS	
CITY/STATE/ZIP Chicago, Illinois 60603		CITY/STATE/ZIP	
TELEPHONE NUMBER (312) 427-3200		TELEPHONE NUMBER	
IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE) 08830399		IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE)	
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TRIAL ATTORNEY? YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>		TRIAL ATTORNEY? YES <input type="checkbox"/> NO <input type="checkbox"/>	
		DESIGNATED AS LOCAL COUNSEL? YES <input type="checkbox"/> NO <input type="checkbox"/>	
(C)		(D)	
SIGNATURE		SIGNATURE	
NAME		NAME	
FIRM		FIRM	
STREET ADDRESS		STREET ADDRESS	
CITY/STATE/ZIP		CITY/STATE/ZIP	
TELEPHONE NUMBER		TELEPHONE NUMBER	
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